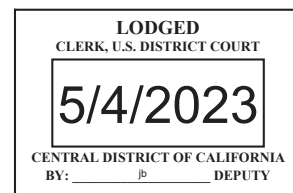
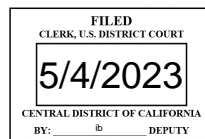


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

v.

BRIAN MCDONALD,
 aka "SOUTHSIDEOXY,"
 aka "REALSOUTHSIDEOXY,"
 aka "JEFEDEMICHOACAN,"
 aka "Malachai Johnson,"

Defendant.

Case No. 2:23-mj-02216-duty

**CRIMINAL COMPLAINT BY TELEPHONE
 OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on a date unknown, and continuing until on or about May 3, 2023, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A)(vi)

Offense Description

Conspiracy to Distribute Fentanyl

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Jaclyn N. Casaceli

Complainant's signature

Jaclyn N. Casaceli, DEA Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 5/4/2023

Judge's signature

City and state: Los Angeles, California

Hon. Alexander F. MacKinnon

Printed name and title

AFFIDAVIT

I, SA Jaclyn Casaceli, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Brian MCDONALD ("**MCDONALD**") for a violation of 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A)(vi): conspiracy to distribute fentanyl.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, a review of law enforcement databases, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent (SA) with the Drug Enforcement Administration (DEA), United States Department of Justice, and I am currently assigned to the St. Louis Division Office (SLDO). I have been employed by the DEA since June 2018, during which time I have specialized in investigations involving narcotics

trafficking. Prior to my assignment with the DEA, I was a Police Officer with the Cranston, Rhode Island Police Department for approximately two years and a Police Officer with the Middletown, Rhode Island Police Department for approximately three years.

4. Upon joining the DEA, I completed 16 weeks of training in drug investigations and related legal matters at the DEA's Training Academy in Quantico, Virginia. Coursework at the Training Academy included Drug Identification, Undercover Techniques, Tactical Training, Interview and Interrogation Techniques, and Legal Instruction. Since then, I have received additional training in Cyber Investigations, Cryptocurrency tracing and Undercover Techniques. While at the DEA, I have also personally participated in multiple narcotics investigations.

5. Through my training and experience, I am familiar with the way in which narcotic traffickers conduct their business, including, but not limited to: the types and amounts of drugs distributed; the types and amounts of profits made; the methods of importing and distributing controlled substances; the use of mobile telephones, email accounts, and the Internet to facilitate their transactions; and the use of numerical codes and code words to conduct their dealings.

6. I have participated in investigations that have led to the issuance of search warrants involving violations of narcotic laws. These warrants involved the search of locations including: residences of targets, their associates and relatives, "stash

houses" (houses used as drug/money storage locations), storage facilities, cellular/camera phones, and computers. Evidence, searched for, and recovered in these locations has included controlled substances, records pertaining to the expenditures and profits realized there from, monetary instruments and various assets that were purchased with the proceeds of the drug trafficking. I have participated in the execution of multiple federal search warrants.

III. SUMMARY OF PROBABLE CAUSE

7. **MCDONALD** is the leader of a multi-year darknet drug trafficking conspiracy to package and distribute large quantities of illegal drugs, including fentanyl and cocaine. As detailed below, **MCDONALD** and other co-conspirators used multiple vendor monikers on darknet marketplaces, including **SOUTHSIDEOXY**, **REALSOUTHSIDEOXY**, and **JEFEDEMICHOCAN**, to sell hundreds of thousands of dollars' worth of fentanyl-laced pills and cocaine since at least April of 2021. In one text message from July 23, 2021, **MCDONALD** advised a co-conspirator ("Co-Conspirator 1") that, over the previous 30 days, the drug trafficking operation had generated \$297,000 in revenue, and produced a profit of \$160,000. That same month, **MCDONALD** stated that he would pay Co-Conspirator-1 \$10,000 a month for being his "right hand man."

8. The DEA and FBI have conducted multiple controlled

buys of fentanyl and cocaine from the **SOUTHSIDEOXY**, **REALSOUTHSIDEOXY**, and **JEFEDEMICHOCAN** dark web vendor accounts. On May 3, 2023, federal agents executed multiple search warrants, including a warrant to search **MCDONALD**'s residence. Inside **MCDONALD**'s residence, agents found, inter alia, approximately 287 grams of suspected counterfeit oxycodone M30 pills, two firearms with fully loaded magazines, several hundred rounds of ammunition, and other evidence linking **MCDONALD** to the darknet drug trafficking scheme.

V. STATEMENT OF PROBABLE CAUSE

9. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. LAW ENFORCEMENT IDENTIFIES SOUTHSIDEOXY, REALSOUTHSIDEOXY, AND JEFEDEMICHOCAN AS VENDORS OF ILLICIT DRUGS OPERATING ON THE DARK WEB, AND INTERCEPTS PACKAGES FROM EACH SITE

10. Beginning in or around July 2021, DEA Cape Girardeau Resident Office agents and agents from the United States Postal Inspection Service ("USPIS") initiated an investigation into the drug trafficking organization known by the vendor moniker **SOUTHSIDEOXY**, which was believed to be selling illicit drugs on the dark web marketplace "White House Market." According to the vendor profile for **SOUTHSIDEOXY** on White House Market, **SOUTHSIDEOXY** began selling illegal narcotics on the marketplace in or around April 2021, and included listings for counterfeit

oxycodone M30 pills and cocaine.

11. On August 17, 2021, DEA agents made an online purchase of counterfeit oxycodone M30 pills and cocaine from **SOUTHSIDEOXY** via White House Market. During this transaction, agents first navigated to the profile page for **SOUTHSIDEOXY**. They then navigated to a listing labeled "96% Pure Coke 7g" and purchased 7 grams of cocaine via this listing. The purchase price for this transaction was 1.436231328992 Monero (approximately \$370 in United States currency).¹ Agents then navigated to a listing labeled "Oxy M30 50 Pack" and purchased 50 counterfeit oxycodone pills from this listing. The purchase price for this transaction was 1.203042533374 Monero (approximately \$310 in United States currency). Agents had the drugs shipped to an undercover address in Southeast Missouri.

12. Agents received the drug parcel from **SOUTHSIDEOXY** on or about August 24, 2021. Located inside the box was one baggie containing a white, powder-like substance with the marking "7g" written in black marker, and a second baggie containing blue pills with the markings "M" on one side and "30" on the reverse side. The white, powder-like substance was subsequently

¹ Monero cryptocurrency, being described as a privacy coin, adds layers of anonymity by using a technology suite to obscure transactions making it more difficult for law enforcement to trace. Monero is widely used by dark web marketplaces and vendors as a form of payment for illicit goods because of its anonymity.

analyzed and lab tested positive for cocaine. The blue pills -- which agents suspected to be counterfeit oxycodone M30 pills -- were likewise analyzed and lab tested positive for fentanyl.

13. On September 22, 2021, DEA agents purchased 200 counterfeit oxycodone M30 pills from **SOUTHSIDEOXY** on White House Market. The counterfeit oxycodone pills were located inside a United States Postal Service ("USPS") small flat rate box packaged similarly to the first controlled purchase from **SOUTHSIDEOXY**. The suspected counterfeit oxycodone M30 pills lab tested positive for fentanyl. The listed return address for this package was the address of the Pacific Oaks College campus in Pasadena, California.

14. On October 1, 2021, a DEA undercover agent digitally captured the dark web vendor profile for **SOUTHSIDEOXY** on White House Market. As of October 1, 2021, the **SOUTHSIDEOXY** vendor profile indicated that the vendor account had been used to complete approximately 1,350 sales and had approximately 846 customer reviews.

15. That same month, White House Market administrators announced that they would be shutting down White House Market. Shortly after the shutdown, in November 2021, agents located a dark web vendor profile identified by the vendor moniker "**REALSOUTHSIDEOXY**" on ToRReZ market, another darknet

marketplace. According to ToRReZ Market, **REALSOUTHSIDEOXY**'s ToRReZ vendor profile was created on November 4, 2021.

16. An analysis of the PGP public key² identified in **REALSOUTHSIDEOXY**'s vendor profile revealed that that PGP public key was the same PGP public key used by **SOUTHSIDEOXY**'s White House Market vendor profile, leading agents to believe that both profiles were controlled by the same individual(s). The PGP public key for **SOUTHSIDEOXY** and **REALSOUTHSIDEOXY** had an associated email address of fastmoneyboys@protonmail.com.³ According to ToRReZ Market, **REALSOUTHSIDEOXY**'s ToRReZ vendor profile was created on November 4, 2021.

17. On December 6, 2021, DEA agents made an online purchase of counterfeit oxycodone M30 pills from **REALSOUTHSIDEOXY** on ToRReZ Market. The counterfeit oxycodone pills the agents received were located inside a USPS small flat rate box packaged similarly to the first two controlled

² Pretty Good Privacy ("PGP") keys are a mechanism to encrypt, decrypt, and sign messages or files using a public and private key pair to ensure the confidentiality and integrity of data. PGP keys allow for secure communication between vendors and clients. Public keys are always unique and contain important metadata that can be extracted, such as names and emails of the user of the PGP public key. Extracted names and emails are usually associated with vendor aliases rather than real identities, but since vendors typically use the same public key across different sites, their PGP public key provides the strongest automatically detected indicator in linking multiple aliases to a single vendor.

³ ProtonMail is an encrypted email platform based in Switzerland. Darknet drug traffickers often use ProtonMail and other non-U.S.-based communication platforms to conceal their illegal activities from law enforcement inside the United States.

purchases from **SOUTHSIDEOXY**. The suspected counterfeit oxycodone M30 pills agents received lab tested positive for fentanyl.

18. On February 3, 2022, FBI agents made an online purchase from **SOUTHSIDEOXY** through the dark web marketplace Dark0de Market. In this transactions, FBI agents paid .007648 Bitcoin (approximately \$283.25) for 50 counterfeit oxycodone M30 pills. The drugs agents received were shipped in a USPS express envelope. The suspected counterfeit oxycodone M30 pills the FBI received lab tested positive for fentanyl.

19. On February 16, 2022, FBI agents purchased 50 counterfeit oxycodone M30 pills from **SOUTHSIDEOXY** on Dark0de Market. The purchase price for this transaction was .006515 Bitcoin (approximately \$283.25). The suspected counterfeit oxycodone M30 pills agents received lab tested positive for fentanyl, Lidocaine and Xylazine.

20. On April 8, 2022, UPSIS Kansas City Inspectors intercepted an Express Mail parcel, with tracking number 9470136109361171270840, and with a return address in Culver City, California. After the recipient gave USPIS Inspectors consent to search the parcel, inspectors located an orange padded envelope with approximately 800 blue pills, each with markings consistent with oxycodone M30 pills. The packaging for the shipment was consistent with the drug parcels FBI Los

Angeles agents had received as a result of undercover purchases from dark web vendor **SOUTHSIDEOXY**. On April 27, 2022, DEA agents interviewed the recipient, who stated that he had purchased oxycodone M30 pills on two separate occasions from dark web vendor **JEFEDEMICHOCAN**, operating on AlphaBay Market. In addition to the intercepted parcel, the recipient stated that he had placed and received an order for 100 oxycodone M30 pills purchased in March 2022.

21. On April 21, 2022, DEA Colorado Springs, Colorado agents executed a search warrant on USPS Express Mail parcel, with tracking number 9470136109361180585775, and with a return address in San Fernando, California. The package contained approximately 50 blue pills with markings consistent with oxycodone M30 pills. That same day, DEA agents conducted an interview of the intended recipient. From that interview, agents learned that the intended recipient had purchased "50 M30 Super Smackers" from dark web vendor **JEFEDEMICHOCAN** on April 7, 2022 through the AlphaBay dark web marketplace.

22. On April 21, 2022, DEA agents located a dark web vendor profile identified by the vendor moniker **JEFEDEMICHOCAN** on the dark web marketplace, AlphaBay Market. The PGP key identified in **JEFEDEMICHOCAN's** AlphaBay vendor profile was compared to the PGP key used by **SOUTHSIDEOXY** and **REALSOUTHSIDEOXY's** vendor profiles on White House Market, ToRReZ

Market and Dark0de Reborn. Agents were able to determine that **JEFEDEMICHOCAN** utilized the same PGP key as **SOUTHSIDEOXY** and **REALSOUTHSIDEOXY**, leading agents to believe that all three profiles were controlled by the same individual(s). That same day, agents located a dark web vendor profile identified by the vendor moniker **JEFEDEMICHOCAN** on the dark web marketplace, Versus Market.⁴ Agents were again able to determine that **JEFEDEMICHOCAN**'s Versus Market vendor profile utilized the same PGP key as **SOUTHSIDEOXY** and **REALSOUTHSIDEOXY**.

23. On May 16, 2022, Cranston Police Department Detectives and USPIS Rhode Island Inspectors executed a search warrant on a USPS Express Mail parcel, with tracking number 9405536109361307937719, with a return address in La Puente, California. The parcel contained 100 blue pills with markings consistent with oxycodone M30 pills, and field tested positive for fentanyl. The recipient told detectives that he had purchased the pills from the dark web vendor **JEFEDEMICHOCAN**, and that he had previously purchased counterfeit oxycodone pills from **JEFEDEMICHOCAN** on three other occasions.

⁴ On April 26, 2022, a DEA undercover agent digitally captured the dark web vendor profile for **JEFEDEMICHOCAN** on Versus Market. The profile was created on March 16, 2022 and, as of April 26, 2022, showed 49 completed sales totaling approximately 2,689 counterfeit Oxycodone pills.

B. LAW ENFORCEMENT LINKS MCDONALD TO THE DRUG CONSPIRACY

24. During this investigation, agents searched law enforcement databases for the username "southsideoxy." These law enforcement databases contain data previously seized by law enforcement from various dark web marketplaces and websites. Based on this database search, agents discovered that someone using the username "SouthSideOxy" was linked to an Xleet.to account (the "SouthSideOxy Xleet account").⁵ The SouthSideOxy Xleet user account was created on September 8, 2020 and utilized the email address fastmoneyboys@protonmail.com -- the same email address associated with the PGP public key used by the dark web vendor accounts **SOUTHSIDEOXY**, **REALSOUTHSIDEOXY** and **JEFEDEMICHOCAN**, leading agents to believe that both the Xleet user account and dark web vendor profiles were controlled by the same individual(s).

25. On March 2, 2021, at approximately 8:58 p.m. (UTC), a user login IP address of 76.168.149.173 was captured by Xleet.to for a user accessing the SouthSideOxy Xleet account. Through open source research, agents were able to determine the IP

⁵ Xleet.to is a marketplace accessible through the regular Internet (also known as the clear web). To access the site, individuals must register with a username and password. The site sells illicit digital goods such as financial and sensitive credentials that hackers can leverage to carry out other crimes such as identity theft, credit card fraud, account takeovers, and more. The site also sells hacked account information from victims for buyers to use and exploit, allowing threat actors to impersonate the victim for financial or informational gain.

address belonged to Charter Communications. A subpoena return from Charter Communications showed that the IP address was used by an account subscribed to "Brian **MCDONALD**," with a subscriber phone number of 818-966-8237 and a service address of 5623 Carlton Way Apartment 305, Los Angeles, California.

C. AGENTS OBTAIN A SEARCH WARRANT FOR MCDONALD'S iCloud ACCOUNT AND FIND EVIDENCE OF DRUG TRAFFICKING AND OTHER CRIMES.

26. On August 4, 2022, the Honorable Steve Kim, United States Magistrate Judge, signed a warrant to search the iCloud (Apple Inc.) account associated with **MCDONALD**. See Case No. 2:22-MJ-03051. In addition to containing substantial evidence showing that **MCDONALD** controls the iCloud account, the records produced by Apple Inc. contained the following:

a. Photographs and videos depicting large quantities of suspected illegal drugs, blank fraudulent prescription pads, fraudulent prescriptions (along with photo identifications), and

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prescription pill bottles, including the following photographs:



b. Photographs of **MCDONALD** packaging drug shipments with materials consistent with those in the drug shipments received by law enforcement officers following the above-described controlled purchases from **SOUTHSIDEOXY**, **REALSOUTHSIDEOXY**, and

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JEFEDEMICHOCAN, as well as handwritten ledgers depicting order amounts and customer addresses;



c. Photographs of bank statements, money counters, and bulk United States currency in shoe boxes, spread out on surfaces, or held by **MCDONALD** and co-conspirators;



d. Photographs of multiple firearms with large amounts of ammunition; and



e. Photographs of credit cards in numerous individuals' names, banking withdrawal receipts, counterfeit identifications belonging to **MCDONALD**, and computer screens displaying internet browser tabs with banking information for third parties believed to be victims of identity theft.

27. Additionally, during my review of the records provided by Apple Inc., I seized numerous text message conversations with evidence related to drug trafficking, including:

a. Text message conversations between **MCDONALD** and various sources of supply, detailing purchases of thousands of counterfeit oxycodone pills in exchange for United States currency and cryptocurrency;

b. Text messages between **MCDONALD** and customers who purchased illegal drugs from **MCDONALD** in and around the greater Los Angeles area;

c. Text messages regarding the quantity of drugs being sold through the dark web vendor accounts operated by **MCDONALD**, including text messages between **MCDONALD** and Co-Conspirator 1 from August 9, 2021 in which Co-Conspirator 1 stated that he was processing "so many orders" and that "there's only bout maybe [a] boat left,"⁶ and **MCDONALD** stated "now you see what i go thru" "every single day" "x10."

d. Text messages with co-conspirators discussing the labeling, packaging, and shipping of dark web drug orders, including one conversation, from May 16, 2021, in which **MCDONALD** informed Co-Conspirator 1 that he had sold "2 yatchs" -- or 20,000 pills⁷ -- worth of what agents believe to be counterfeit

⁶Through my training and experience, I believe that a "boat" is a slang term for 1,000 pills.

⁷ Through my training and experience, I believe that a yacht is a slang term for 10,000 pills, meaning the reference to "2 yatchs" [sic] would mean that **MCDONALD** was advising Co-Conspirator 1 that he sold 20,000 counterfeit oxycodone M30 pills within his first two weeks of running **SOUTHSIDEOXY**.

oxycodone M30 pills in the two weeks since he had begun selling on the "marketplace," and further stating that he had \$42,000 in his marketplace account that he had yet to withdraw;

e. Text messages regarding the large quantities of money generated by **MCDONALD**'s fentanyl trafficking operation, including one text message exchange from July 23, 2021 in which **MCDONALD** stated that, over the course of the "last 30 days," he had received \$297,000 in revenue, and made a "profit" of \$160,000.

f. Text messages between **MCDONALD** and his co-conspirators regarding payments **MCDONALD** would make to his co-conspirators, including one exchange with Co-Conspirator 1 in which **MCDONALD** told Co-Conspirator 1 that "as my right hand you'll get 10k a month."

g. Text messages regarding the purchase of firearms with the intention of altering serial numbers;

h. Text messages between **MCDONALD** and co-conspirators depicting photographs and screenshots of social security numbers along with names and dates of birth, and photographs of banking information including online banking usernames and passwords belonging to various third parties; and

i. Text messages between **MCDONALD** and co-conspirators discussing bank accounts and credit cards belonging to third parties who are believed to be fraud victims.

28. Furthermore, during my review of the records provided by Apple Inc., I seized text documents containing:

a. Usernames and passwords for **SOUTHSIDEOXY** dark web vendor accounts and websites, including accounts where the username **SOUTHSIDEOXY** was used; and

b. Usernames and passwords for email accounts, including fastmoneyboys@protonmail.com and bitcoinnbandit@protonmail.com.

D. MCDONALD POSSESSES FIREARMS TO PROTECT THE DRUG TRAFFICKING BUSINESS

29. **MCDONALD** has possessed and relied on firearms to protect his drug trafficking business. In addition to the evidence described above related to **MCDONALD's** possession of firearms, I seized the following evidence from **MCDONALD's** iCloud account:

a. On July 22, 2021, one of **MCDONALD's** co-conspirators, Co-Conspirator 2, sent a text message to **MCDONALD** advising that her "Aunt Nanette" had a gun license. **MCDONALD** responded that he wanted "Nanette" to purchase firearms on his behalf and that he would change the "firepins" and "serials."

b. On November 19, 2021, **MCDONALD** sent a text message to Co-Conspirator 2 stating that he needed to buy "long jackets" to "hide" his firearm "cuz i'm rlly not go out without it...too much shit going on." **MCDONALD** further emphasized that he was a "REAL DRUG DEALER BABY" who could "get anything anywhere."

**E. AGENTS EXECUTE SEARCH WARRANTS ON MAY 3, 2023 AND FIND
SUSPECTED FENTANYL AND GUNS AT MCDONALD'S RESIDENCE**

30. On May 2, 2023, the Honorable Alexander F. MacKinnon, a United States Magistrate Judge for the Central District of California, issued multiple search warrants related to this investigation, including a warrant to search **MCDONALD'S** residence. (See Case No. 23-MJ-2131.)

31. On May 3, 2023, law enforcement officers executed the search warrants. During the search of **MCDONALD'S** residence, agents found approximately 287 grams of suspected counterfeit oxycodone M30 pills, two firearms with fully loaded magazines, several hundred rounds of ammunition, and other evidence that **MCDONALD** continued to sell illegal drugs on the darknet, including drug packaging materials.

CONCLUSION

32. For all the reasons described above, there is probable cause to believe that **MCDONALD** violated 21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A)(vi): conspiracy to distribute fentanyl.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone this 4th day of May
2023



HONORABLE ALEXANDER F. MACKINNON
UNITED STATES MAGISTRATE JUDGE